

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF MISSISSIPPI

IN RE: ANTONY ALEXANDER,  
DEBTOR

NO. 19-13708  
CHAPTER 13

OBJECTION TO CONFIRMATION OF PLAN

Comes now, Creditor Mississippi Department of Human Services (MDHS), by and through its undersigned attorney, and hereby serves its notice of objection to confirmation of the Debtor's Chapter 13 Plan, and in support thereof would show unto the Court the following:

1. Debtor Antony Alexander has two child support obligations. He is obligated to pay Emma Taylor \$132.00 per month and has an arrearage of \$5,877.35. He is also obligated to pay Nancy Stewart \$250.00 per month and has an arrearage of \$2,320.00.
2. Proofs of Claim were filed on October 17, 2019 and are incorporated herein for all their intended purposes.
3. On his proposed plan, Debtor has stated that he will pay one of his ongoing obligations direct and does not mention his second obligation nor his arrears balances.
4. MDHS rarely receives any payment and the arrearages increase every month.
5. Antony Alexander should be required to pay his monthly support obligations and arrearages through the plan.

WHEREFORE, PREMISES CONSIDERED, creditor MDHS requests that this Court deny confirmation of the Plan, and order Debtor pay his monthly child support obligation and his arrearage through the plan.

Respectfully submitted, this, the 17<sup>th</sup> day of October, 2019.

/s/ Constance L Morrow  
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**CERTIFICATE OF SERVICE**

I, Constance L Morrow, representative for Creditor, MDHS-DCSE, do hereby certify that I have this date either emailed a true and correct copy or electronically mailed through ECF, a copy of the attached foregoing Objection to Plan, to the following:

Robert H. Lomenick, Jr.  
Attorney for Debtor

United States Trustee  
[USTPRegion05.AB.ECF@usdoj.gov](mailto:USTPRegion05.AB.ECF@usdoj.gov)

Locke D. Barkley  
Chapter 13 Trustee

This, the 17<sup>th</sup> day of October, 2019.

/s/ Constance L Morrow